

To: Rebecca Sawyer[rsawyer@excelsiormining.com]; Alison Jones[ajones@clearcreekassociates.com]
Cc: Johnson, AudreyL[Johnson.AudreyL@epa.gov]; Albright, David[Albright.David@epa.gov]
From: Rumrill, Nancy
Sent: Wed 8/9/2017 11:42:22 PM
Subject: FW: Suggested topics for Conference Call with Excelsior on August 10.

Hi Rebecca,

Our contractor is still considering the clarifications that were submitted on August 4. These are the items on the agenda to discuss tomorrow during the conference call in terms of the draft permit language.

Thanks, Nancy



United States Environmental Protection Agency

Nancy Rumrill (rumrill.nancy@epa.gov)

Drinking Water Protection Section (WTR-3-2)

US EPA, Region IX

75 Hawthorne St.

San Francisco, CA 94105

Phone (415) 972-3293

From: JAMES D WALKER
Sent: Wednesday, August 9, 2017 3:59 PM
To: Rumrill, Nancy <Rumrill.Nancy@epa.gov>
Cc: Shari.Ring@cadmusgroup.com

Subject: RE: Suggested topics for Conference Call with Excelsior on August 10.

1. Conductivity sensors demonstrations
2. Groundwater quality monitoring frequency and parameters.
3. POC well abandonment costs are still attributed to ADEQ in the text of Attachment R-13.
4. Maximum allowable surface injection pressure safety factor of 0.9 time calculated surface pressure.
5. Temperature logging procedures and purpose.
6. Insufficient number of active HC and observation wells in early years of ISR operations, based on maps in Figures A-13 to A-16 and Tables 2.5.2 and 2.5.3. Schedule and location of HCWs and OWs will be subject to EPA review and approval as mining operations proceed.
7. Final RVW and CVW locations will be subject to EPA review and approval based on recovery well performance and locations. Reference to Figure A -19. Is there a table listing the proposed well locations?
8. The revised permit application language is partially acceptable, subject to permit conditions that may differ from the permit application language, tables, and figures. Figures P-1 to P-6, and Tables P-3 and P-4, provided in the April 2017 response to EPA comment document, are omitted and new Tables P-1 to P-4 are added in the revised permit application. *Figures P-1 to P-6 and Tables P-3 and P-4 provided in the April 2017 response document should be included in the revised application. The deletions in Table P-2 should be clarified or restored to the table and added to Table P-4.* This is ok to refer to the existing Attachment A-1 figures and tables, if the information is the same.

9. The revised permit application language and figures are incomplete. Figure S-9 is missing from the revised Attachment S in the application. *Figure S-9 should be included in Attachment S.*

There may be additional topics added on Thursday before the conference call as I review my comments on the revised permit application.

Thanks,

Jim

From: Rumrill, Nancy
Sent: Wednesday, August 9, 2017 2:18 PM
To: JAMES D WALKER
Subject: FW: your call

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*Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))*

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**From:** Alison Jones [<mailto:ajones@clearcreekassociates.com>]  
**Sent:** Wednesday, August 2, 2017 4:50 PM  
**To:** Rumrill, Nancy <[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>  
**Cc:** Rebecca Sawyer ([rsawyer@excelsiormining.com](mailto:rsawyer@excelsiormining.com)) <[rsawyer@excelsiormining.com](mailto:rsawyer@excelsiormining.com)>  
**Subject:** RE: your call

Hi Nancy,

Those tables in the APP are in Word. I just copied them from the draft APP and put them in this document. We'll be getting the rest of the pieces to you tomorrow.

Alison

**From:** Rumrill, Nancy [<mailto:Rumrill.Nancy@epa.gov>]  
**Sent:** Wednesday, August 02, 2017 1:48 PM  
**To:** Alison Jones  
**Cc:** Rebecca Sawyer ([rsawyer@excelsiormining.com](mailto:rsawyer@excelsiormining.com))  
**Subject:** RE: your call

Hi Alison,

Per my phone call to you, you can just provide a new page 9 with the correct references in the application. This includes the corrections to the IMWs references for Tables P-3 and P-4. We would need an updated electronic copy of the revised application too.

In addition, I asked for the IMW Table (Table 2.5-1) from the draft APP. Although I said in my phone call with you that we have Table P-1 locational information for the Observation and Hydraulic Control Wells, I like the tables in the draft APP (Tables 2.5-2 and 2.5-3) better and would like a copy of these tables from you.

Let me know if you have any questions for me.

Thanks, Nancy

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From: Alison Jones [<mailto:ajones@clearcreekassociates.com>]

Sent: Wednesday, August 2, 2017 12:10 PM

To: Rumrill, Nancy <Rumrill.Nancy@epa.gov>

Cc: Rebecca Sawyer (rsawyer@excelsiormining.com) <rsawyer@excelsiormining.com>

Subject: your call

Hi Nancy,

I got your voicemail about Attachment P. Specifically, on page 9, we referred to several drawings (p-2 through P-6). You are correct. We did not include them and it was an oversight.

The figures are exactly the same as A-13 through A-17 in Attachment A-1. We were just going to re-number them and put in Attachment P.

I can fix this one of two ways:

1—provide you with a new Page 9 for Att P that refers to Figures A-13 through 17

OR

2—Provide you with P-2 through 6.

Let me know your preference.

Alison

Alison H. Jones, R.G.

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